

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LULAC, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

Case No.: 3:21-CV-00259-DCG-JES-JVB
[Lead Case]

ROY CHARLES BROOKS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

Case No.1-21-CV-00991-DCG-JES-JVB
[Consolidated Case]

THE BROOKS PLAINTIFFS' NOTICE OF SUBMISSION OF EXPERT REPORTS

Pursuant to the Court's Supplemental Pretrial Scheduling Order dated May 1, 2025 (Dkt. 921), the Brooks Plaintiffs hereby submit the expert reports that it intends to affirmatively rely on and submit as evidence at the upcoming trial in the above-captioned matter, scheduled to commence on May 21, 2025. The expert reports attached to this submission are as follows:

- Attachment A: Dr. Matt Barreto Expert Report, dated May 20, 2022
- Attachment B: Dr. Matt Barreto Rebuttal Expert Report, dated July 27, 2022
- Attachment C: Supplemental Dr. Matt Barreto Expert Report, dated March 31, 2025
- Attachment D: Dr. Tye Rush Expert Report, dated March 31, 2025
- Attachment E: Dr. Matt Barreto Rebuttal Expert Report, dated April 16, 2025

Consistent with the Court's Order, color copies of the above-referenced expert reports will be delivered to the chambers of each judge on or before May 8, 2025.

The following expert reports were relied upon in the Preliminary Injunction Hearing and remain evidence the Brooks Plaintiffs rely upon for this Court's final judgment.

- Matt Barreto Expert Report, dated November 24, 2021 (Ex. 7 - PI Hrg. Exhibits)
- Dr. Jeronimo Cortina Expert Report, dated January 7, 2022 (ECF 158-1)
- Matt Barreto Rebuttal Expert Report, dated January 19, 2022 (ECF 158-2)
- Dr. Jeronimo Cortina Rebuttal Expert Report, dated January 19, 2022 (ECF 158-3)

May 2, 2025

Respectfully submitted,

/s/ Chad W. Dunn

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CERTIFICATE OF SERVICE

I certify that all counsel of record were served a copy of the foregoing this 2nd day of May 2025, by email.

/s/ Chad W. Dunn
Chad W. Dunn